

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

FILED
HARRISBURG, PA

JAN 30 2003

**JOHN D. PERKEY and
THERESA M. PERKEY,
Petitioners/Plaintiffs**

**RELIABLE CARRIERS, INC.
DANIEL JOSEPH BEMBEN,
AND KENT,
Respondents/Defendants**

MARY E. D'ANDREA, CLERK
per *[Signature]*

CIVIL NO. 1:00-CV-1639

(MAGISTRATE JUDGE SMYSER) ✓

PETITION TO AMEND JOINT CASE MANAGEMENT ORDER

1.

The Petitioner is John D. Perkey, the Plaintiff in this action.

2

The Respondent is Reliable Carriers, Inc., Daniel Joseph Bemben, and Kent.

3

Counsel for the parties have reviewed the status of Discovery as well as the status of the underinsured motorists cases related to this case, and counsel believes that the changes to the Joint Case Management Plan would be appropriate. Counsel for the parties have discussed this with Magistrate Judge Smyser by telephone conference call on January 28, 2003.

4.

There is a good cause for said changes. Discovery will be expected to continue beyond January 31, 2003. The companion cases of Prudential Property v. John D. Perkey and Theresa M. Perkey at 1:CV-02-0819 and John D. Perkey v. Prudential Property & Casualty have consolidated and the same deadlines will be established by an Amended Joint Case Management Order.

5.

The parties hereby request the following changes to the Case Management Order as follows:

Deadline for Discovery:	February 28, 2003
Deadline for Expert Reports:	February 24, 2003
Deadline for Supplemental Expert Reports:	March 24, 2003
Dispositive Motions:	February 28, 2003
Motion in Limine:	April 4, 2003
Pre-Trial Date:	April 17, 2003
Trial Date:	May 5, 2003

6.

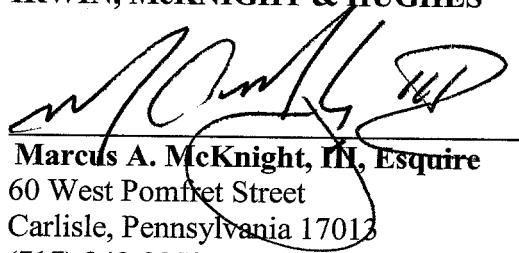
E. Ralph Godfrey, Esq., counsel for the Respondent/Defendant, consents to the requested amendment as set forth herein.

WHEREFORE, the Petitioner/Plaintiff requests that the Court amend the Joint Case Management Plan Order as requested herein.

Respectfully submitted,

IRWIN, McKNIGHT & HUGHES

By:


Marcus A. McKnight, III, Esquire
60 West Pomfret Street
Carlisle, Pennsylvania 17013
(717) 249-2353

Date: January 30, 2003

Supreme Court I. D. No. 25476

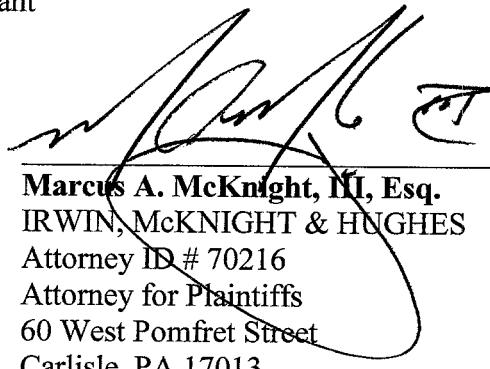
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN D. PERKEY and	:	
THERESA M. PERKEY,	:	CIVIL NO. 1:00-CV-1639
Petitioners/Plaintiffs	:	
	:	
	:	(MAGISTRATE JUDGE SMYSER)
v.	:	
	:	
RELIABLE CARRIERS, INC.	:	
DANIEL JOSEPH BEMBEN,	:	
AND KENT,	:	
Respondents/Defendants	:	

CERTIFICATE OF SERVICE

I, Marcus A. McKnight, III, Esquire, hereby certify that on this date a true and correct copy of the foregoing document was served upon the attorney for Plaintiffs by first-class United States Mail, postage prepaid in Carlisle, Pennsylvania 17013, addressed as follows:

E. Ralph Godfrey, Esquire
GODFREY & COURTNEY, P.C.
P. O. Box 6280
Harrisburg, PA 17112
Attorney for Defendant

By: 

Marcus A. McKnight, III, Esq.
IRWIN, McKNIGHT & HUGHES
Attorney ID # 70216
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Dated: January 30, 2003